

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United States of America *ex rel.*)
Brutus Trading, LLC,)
Plaintiff,)
-against-)
Standard Chartered Bank *et al.*,)
Defendants.)
Case No. 18-cv-11117 (PGE)

DECLARATION OF DAVID A. KOENIGSBERG

I, David A. Koenigsberg, declare the following pursuant to 28 U.S.C. § 1746:

1. I am an attorney duly licensed to practice law in the State of New York and a member of the bar of this Court.

2. In October 2012, Brutus Trading, LLC retained me and my firm with regard to the filing of a lawsuit under the False Claims Act.

3. During the remaining weeks of 2012, I had multiple communications and a meeting with Daniel Alter, Esq., of the New York Department of Financial Services (DFS). On November 7, 2012, I attended a meeting with Mr. Alter and Gaurav Vasisht of DFS, along with Robert Marcellus, one of Relator's principals. The meeting was held at an office located at 633 3rd Avenue being used by DFS following Super Storm Sandy which had flooded lower Manhattan and made DFS's regular offices inaccessible.

4. On behalf of Brutus Trading, LLC, I submitted numerous documents to Assistant U.S. Attorney Jean-David Barnea, including a September 24, 2013 memorandum that I had prepared describing production of records and other information from Anshuman Chandra, whom I was advised was an employee at the time of Standard Chartered Bank Dubai. A copy of this memorandum is attached as Exhibit 10 to Relator's Memorandum in Opposition (Doc. 48-

10). I also submitted a letter dated January 9, 2019 addressed to Mr. Barnea that summarized information that Relator had provided to the Government between 2012 and 2017. I understand that a copy of this letter is to be attached as Exhibit 17 to Relator's Sur-reply memorandum.

I declare under penalty of perjury that the foregoing is true and accurate.

White Plains, New York
Executed on March 12, 2020



David A. Koenigsberg